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July 21, 2009

VIA E-FILE AND REGULAR MAIL

Honorable Patty Shwartz, U.S.M.J.
United States District Court
District of New Jersey
Frank R. Lautenberg U.S. Post Office
And Courthouse Building
50 Walnut Street, Room 477
Newark, New Jersey 07101

Re: Antonio Hernandez v. Borough of Fort Lee, et al
Civil Action No. 2:09-cv-01386 (FSH)
Our File No.: 10112.2900

Dear Judge Shwartz:

Pursuant to your Honors' Order the response to the interrogatories and document production were due on July 15, 2009. However, the parties mutually agreed to extend the response date to July 21, 2009. Moreover, due to the vacation schedule of the Borough employees within the police department, we have had some difficulties scheduling meetings to assemble the information necessary to prepare formal answers in response to the interrogatories. An initial meeting was held on July 7, 2009 with the Defendants' to begin answering the interrogatories. Nevertheless, an additional meeting is required to finalize the answers to interrogatories. Furthermore, we have been required to issue subpoenas for files/documents not currently stored by the Borough in order to properly respond to the Plaintiff's document production. The Defendants' are requesting a thirty (30) day extension to allow sufficient time to receive the subpoenaed documents as well as meet with the Borough employee's necessary to provide responses to interrogatories.

If you have any questions or need further information, please do not hesitate to contact me.

Very truly yours,

s/Mitchell B. Jacobs

MITCHELL B. JACOBS
For the Firm

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